

July 12, 2012

Margaret Hamburg, M.D.
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Hamburg:

As chefs, we use food to help build strong and thriving communities. It is in our interest to create a network of patrons who derive benefits from good food and the social connections that restaurants provide. That is why we are committed to using ingredients and preparing meals that serve our customers' well being.

Misuse and overuse of antibiotics in food animal production does not serve the interests of consumers in the United States. Understandably, Americans are surprised to learn that 70 percent of all antibiotics sold in the United States end up in industrial food animal production uses. Widespread use of antibiotics in food animal production contributes to the growing crisis of antibiotic resistance, which is reflected in the emergence of "superbugs" that can be transferred from animals to humans through food products.

Many chefs and restaurants are sourcing foods from organic or antibiotic-free producers in order to lessen the burden of antibiotic resistance in the food supply and the environment. In the process, we are doing our part to be part of the solution. But we cannot do this alone.

The U.S. Food and Drug Administration (FDA) and other responsible government entities must play a special leadership role. We welcome recent FDA guidelines (Draft Guidance 213, Docket No. FDA-2011-D-0889; and Veterinary Feed Directive Draft Text for Proposed Regulation, Docket No. FDA-2010-N-0155) that asks the pharmaceutical industry to change labeling and marketing practices so that antibiotics in animal feed are no longer used for growth promotion purposes. And we are reassured by FDA's suggestion that veterinarians play a more active role in ensuring that antibiotics are used more judiciously for legitimate medical purposes.

But the FDA guidelines are vague on the issue of what constitutes an appropriate use of antibiotics for prevention of disease. We urge the FDA to work with industry to clarify that blanket dispensing of antibiotics to healthy animals is not a judicious use. It also will be important for the FDA to establish clear baseline data as to how antibiotics are used on the farm so that we all can track progress toward reducing the prevalence of antibiotic use in food animal production. Finally, the FDA should take steps to verify that animal feed labels are changing and that veterinarians are more actively involved in prescribing antibiotics.

We can testify to the extent to which Americans value meals that are built on the basis of healthy ingredients and careful preparation. We recognize that fulfilling these high standards requires a team effort – inside and outside the kitchen. We are committed to doing our part and call on government and industry to do theirs.

Sincerely,

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